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September 5, 2025

By E.C.F.

Hon. Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Lori Zeno et al*, Docket No. 25 Cr. 182 (RPK)

Dear Judge Kovner:

The purpose of this letter motion is to request a 40 day adjournment of the status conference in the above-referenced matter, which is presently scheduled for September 9, 2025 at 11:00 a.m.

This adjournment is sought due to the voluminous nature of the discovery materials in this case, certain software issues that counsel experienced, as well as summer vacation travel. As a result counsel requires adequate additional time to complete review of the discovery materials with the defendant, Lori Zeno. Counsel has also discussed this matter with Damien Brown, Esq., counsel for co-defendant Rashad Ruhani, who joins in this motion for all of the same reasons. Additionally, counsel for both defendants consent to exclusion of time through the date of the next scheduled pretrial conference pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

The government has been informed of defense counsel's intention to make this application, and has indicated that it has no objection.

Thank you for your consideration of this application. If there are any questions, or if additional information is required, please contact me at your Honor's convenience.

Respectfully,

Anthony L. Ricco

Anthony L. Ricco

cc: A.U.S.A. Russell Noble (By E.C.F.)
cc: A.U.S.A. Sean Michael Sherman (By E.C.F.)
cc: Damien Brown, Esq. (By E.C.F.)